

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

BLAIR DOUGLASS, on behalf of himself and  
all others similarly situated,

Plaintiff,

v.

MONDELEZ GLOBAL LLC,

Defendant.

Civil Action No. 2:22-cv-00875-WSH

**STIPULATION OF DISMISSAL WITH PREJUDICE**

Plaintiff Blair Douglass and Defendant Mondelez Global LLC, by and through their undersigned counsel and pursuant to Fed. R. Civ. P. 41(a)(1), hereby stipulate that:

1. On September 19, 2023, the Court granted final approval of the parties' class action settlement agreement ("Order"). (Doc. 26.)

2. The Court's Order requires the parties to dismiss the lawsuit with prejudice pursuant to Rule 41 of the Federal Rules of Civil Procedure no later than thirty (30) days following the expiration of the Agreement Term. (*Id.* at ¶ 10.)

3. The Court's Order also requires that the dismissal be made pursuant to *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375 (1994), such that the Court's dismissal order expressly retains the Court's jurisdiction to enforce the class action settlement agreement against the parties. (*Id.*)

4. In light of the foregoing, the parties hereby stipulate that this action be DISMISSED with prejudice, and with each party bearing their own costs and fees incurred in connection with this action, except as provided in the Court's Order Granting Plaintiff's Motion For Attorneys' Fees And Incentive Award. (Doc. 27.)

5. This dismissal is made pursuant to *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375 (1994), such that the Court shall retain jurisdiction to enforce the class action settlement agreement against the parties.

Respectfully submitted,

**Counsel for Plaintiff and the Class:**

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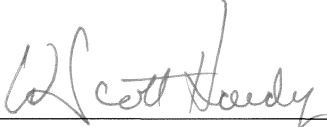
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**SO ORDERED.**

The Stipulation of Dismissal is approved. The action is hereby dismissed with prejudice. Pursuant to *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375 (1994), the Court shall retain jurisdiction to enforce the class action settlement agreement against all parties

  
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W. SCOTT HARDY  
United States District Judge